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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JONNAH GARCIA, an individual;

Case No.: 2:18-cv-2311-RFB-VCF

**Plaintiff,**

V.

NAVIENT SOLUTIONS, LLC, a foreign limited-liability company; NATIONAL RECOVERIES, INC., a foreign corporation; EQUIFAX INFORMATION SERVICES, LLC, a foreign limited-liability company; EXPERIAN INFORMATION SOLUTIONS, INC., a foreign corporation; TRANS UNION LLC, a foreign limited-liability company;

**STIPULATION AND ORDER  
EXTENDING TIME TO FILE  
OPPOSITION TO NATIONAL  
RECOVERIES, INC.'S MOTION FOR  
SUMMARY JUDGMENT [Dkt. 32]  
(First Request)**

## Defendants.

**IT IS HEREBY STIPULATED AND AGREED** between Plaintiff, Jonnah Garcia (“Garcia), and Defendant, National Recoveries, Inc. (“NRI”) (collectively referred to as the “Parties”), by and through their respective attorneys of record, and subject to the approval of the Court, that Plaintiff’s deadline to file her Opposition to NRI’s Motion for Summary Judgment [Dkt. 32], filed on July 26, 2019, is hereby extended up to and including **August 26, 2019**;

Plaintiff received the transcripts from the July 31, 2019 depositions today and requires a brief extension to review these materials to adequately respond to the pending Motion for Summary Judgment:

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1           The Parties have also been in settlement discussions regarding this matter and the  
2 additional time will permit these discussions to continue without expending unnecessary fees and  
3 costs.

4           This is the Parties first request for an extension of this deadline and is not made for the  
5 purpose of delay or bad faith.

6           Respectfully Submitted.

7           Dated: August 15, 2019

8           **LAW OFFICE OF  
9 KEVIN L. HERNANDEZ**

10          */s/ Kevin L. Hernandez*  
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16          Attorney for Plaintiff

7           Dated: August 15, 2019

8           **ALVERSON TAYLOR & SANDERS**

9          */s/ Trevor Waite*  
10         Kurt R. Bonds, Esq.  
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17         Attorneys for National Recoveries, Inc

18           IT IS SO ORDERED:



19           RICHARD F. BOULWARE, II  
20           UNITED STATES DISTRICT JUDGE

21           DATED this 16th day of August, 2019.